

UNITED STATES DISTRICT COURT

for the

Columbia District of Richland County

3rd Division

Orlando Ira Brown on behalf of International Recovery Services LLC, International Trade Finance LLC, and Standard Commerce Bank

Case No.

(to be filled in by the Clerk's Office)

Plaintiff(s)

-V-

Synovus Bank and SunTrust Bank

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

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COMPLAINT AND REQUEST FOR INJUNCTION

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>International Recovery Services LLC</u>
Street Address	<u>440 Rimer Pond Road</u>
City and County	<u>Blythewood/ Richland County</u>
State and Zip Code	<u>South Carolina/ 29016</u>
Telephone Number	<u>(000) 000-0000</u>
E-mail Address	<u>ob8842135@gmail.com</u>

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (*if known*). Attach additional pages if needed.

Defendant No. 1

Name	<u>Synovus Bank</u>
Job or Title (<i>if known</i>)	
Street Address	<u>Forum Drive</u>
City and County	<u>Columbia/ Richland County</u>
State and Zip Code	<u>South Carolina/ 29016</u>
Telephone Number	<u>(888) 796-6887</u>
E-mail Address (<i>if known</i>)	

Defendant No. 2

Name	<u>SunTrust Bank</u>
Job or Title (<i>if known</i>)	
Street Address	<u>Main Street</u>
City and County	<u>Saluda, Aiken/</u>
State and Zip Code	<u>South Carolina</u>
Telephone Number	<u>(888) 888-8888</u>
E-mail Address (<i>if known</i>)	

Defendant No. 3

Name	
Job or Title (<i>if known</i>)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address (<i>if known</i>)	

Defendant No. 4

Name	
Job or Title (<i>if known</i>)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address (<i>if known</i>)	

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (*check all that apply*)

Federal question Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Title 5 of the Americans with Disabilities Act
42 U.S.C. Section 2000 d-7

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) _____, is a citizen of the State of (name) _____.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) _____, is a citizen of the State of (name) _____. Or is a citizen of (foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) Synovus and SunTrust, is incorporated under the laws of the State of (name) South Carolina, and has its principal place of business in the State of (name) South Carolina. Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

International Recovery Services LLC had beneficiary accounts at, first, SunTrust Bank, and last, Synovus Bank. I was coerced by way of a police issued trespass notice to not return to do business for reason or reasons not given by SunTrust official manager Richard Miller 111. I was also coerced by Judy Powers of Synovus Bank by way of her criminalizing label, "a fraud", without proper prosecution, and further denied normal business transactions and products for small businesses such as my International Recovery Services LLC. The beneficiary amount was 5 million dollars from Standard Commerce Bank, a privately held commercial investment bank, in the form of a Bank Guarantee, not received to this date, and not used as the standby letter of credit that the SWIFT draft stated it was as should be standard.

Both denying authorities mentally configured disabling characteristics which was only possible motive of denial. Synovus may have retaliated because I sued them in 2014.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the injunction or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. Where did the events giving rise to your claim(s) occur?

Saluda SunTrust Bank branch and Synovus Bank's Forum drive branch in Columbia are the locations of final beneficiary account openings and closings.

B. What date and approximate time did the events giving rise to your claim(s) occur?

SunTrust Bank in or near December 2017. Synovus Bank on 05-15-2018.

C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

Richard Miller 111 with SunTrust had local police issue a no trespass notice without warning. Judy Powers with Synovus closed beneficiary account on 05/14/2018. Filed in this instant action are separate documents proving the aforementioned

IV. Irreparable Injury

Explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.

Monetary damages are needed to cover expenditures that were created in "good faith", acknowledging that the SWIFT draft I received served as a "Standby Letter of Credit", for up to the guaranteed amount of 5 million USD, that Standard Commerce Bank termed unconditional and irrevocable. Also, I had to file my taxes showing that 5 million USD Bank Guarantee as income for 2017, of which was drafted November 2017, of which produced taxes owed of 1.9 million USD for state of South Carolina and federal taxes. Also, the brokerage firm, International Trade Finance LLC, which procured the Bank Guarantee (B.G.), with offices in Dover, Delaware, are, consequently, in the same shape for not receiving their \$225,000.00 fee from the B.G. proceeds.

Also, there is no knowledge of what happened to the beneficiary wire that Standard Commerce has sent, how many times, and or if returned. /mbr

V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Compensatory damages are claimed by Orlando Ira Brown with International Recovery Services LLC, for International Recovery Services LLC, International Trade Finance LLC, and Standard Commerce Bank of Cainfield, Dominica, for the amount of 20 billion USD. The interruption of flow of commerce and trade has caused an immeasureable amount of monetary, mental, spiritual, emotional, and physical abuse. Lack of convenience and lack of enjoyment of life are priceless as well. Coupled with the prior reasons are of course pain and suffering and emotional distress, all of an effective measure of crippling our businesses' reputation and thus profitability.

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 05/15/2018

Signature of Plaintiff
Printed Name of Plaintiff



Orlando Ira Brown/Owner of International Recovery Services LLC

B. For Attorneys

Date of signing: _____

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Street Address _____

State and Zip Code _____

Telephone Number _____

E-mail Address ob8842135@gmail.com